

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

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	:	
In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., <i>et al.</i>	:	Case No. 08-35653-KRH
	:	
Debtors.	:	Jointly Administered
	:	Judge Kevin R. Huennekens
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**NOTICE OF MOTIONS AND NOTICE OF HEARING**

PLEASE TAKE NOTICE THAT Federal Warranty Services Corporation, Sureway, Inc., American Bankers Insurance Company of Florida, United Service Protection, Inc. and Assurant, Inc. (collectively, the “Assurant Companies”) filed the *Motion to Compel Assumption or Rejection of Agreements between the Assurant Companies and Circuit City Stores, Inc., or in the Alternative Motion for Relief from Stay to Terminate Agreements, and Memorandum in Support* (the “Motion to Compel”). A true and complete copy of the Motion to Compel has been filed with the Court and forwarded to you.

PLEASE TAKE FURTHER NOTICE THAT the Assurant Companies filed the *Motion for Expedited Hearing on the Motion to Compel Assumption or Rejection of Agreements between*

.R. Smith [VSB No. 41913]  
**HUNTON & WILLIAMS LLP**  
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951 East Byrd Street  
Richmond, Virginia 23219-4074  
Telephone: (804) 788-8200  
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*Counsel for American Bankers  
Insurance Company of Florida,  
Federal Warranty Service  
Corporation, Sureway, Inc.,  
United Service Protection, Inc.  
and Assurant, Inc.*

Raul A. Cuervo [DCB No. 463718]  
**JORDEN BURT LLP**  
1025 Thomas Jefferson St., N.W.  
Suite 400 East  
Washington, DC 20007  
Telephone: (202) 965-8100  
Facsimile: (202) 965-8104

*the Assurant Companies and Circuit City Stores, Inc., or in the Alternative Motion for Relief from Stay to Terminate Agreements, and Memorandum in Support (the “Motion to Expedite”) requesting an expedited hearing on the Motion to Compel on **January 29, 2009** at 10:00 a.m. prevailing Eastern Time in the United States Bankruptcy Court for the Eastern District of Virginia, 701 East Broad Street, Courtroom 5000, Richmond, Virginia 23219 (the “Motion to Compel Hearing”).*

PLEASE TAKE FURTHER NOTICE THAT a hearing on the Debtors’ Motion to Expedite is scheduled for hearing **January 29, 2009** at 10:00 a.m. prevailing Eastern Time in the United States Bankruptcy Court for the Eastern District of Virginia, 701 East Broad Street, Courtroom 5000, Richmond, Virginia 23219.

**PLEASE TAKE FURTHER NOTICE THAT your rights may be affected. You should read the Motion to Compel and Motion to Expedite carefully and then discuss them with you attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult with one).**

PLEASE TAKE FURTHER NOTICE THAT any objection to the Motion to Expedite must be made in writing, filed with the Bankruptcy Court at the following address: Clerk of the United States Bankruptcy Court, 701 East Broad Street, Suite 4000, Richmond, Virginia 23219, and served so as to be received by (i) Douglas M. Foley, Esq., McGuireWoods LLP, 9000 World Trade Center, 101 W. Main St., Norfolk, Virginia 23510; (ii) Dion W. Hayes, Esq., McGuireWoods LLP, One James Center, 901 E. Cary St., Richmond, Virginia 23219; (iii) Gregg Galardi, Esq., Skadden Arps, Slate Meagher & Flom LLP, One Rodney Square, Box 636,

Wilmington, Delaware 19899; (iv) Robert B. Van Arsdale, Esq., Office of the United States Trustee, 701 East Broad Street, Suite 4304, Richmond, Virginia 23219; (v) Lynn L. Tavenner, Esq., Tavenner & Beran PLC, 20 North Eighth Street, Second Floor, Richmond, Virginia 23219; (vi) Brad R. Godshall, Esq., Jeffrey N. Pomerantz, Esq., Pachulski Stang Ziehl & Jones, LLP, 10100 Santa Monica Blvd., 11th Floor, Los Angeles, California 90067-4100; (vii) John D. Fiero, Esq., Pachulski Stang Ziehl & Jones, LLP, 150 California Street, 15th Floor, San Francisco, California 94111-4500; and (viii) Robert J. Feinstein, Esq., Pachulski Stang Ziehl & Jones, LLP, 780 Third Ave., 36th Floor, New York, New York 10017 **no later than 11:59 p.m. prevailing Eastern Time on January 28, 2009** (the “Objection Deadline”). Unless a written response is filed and served before the Objection Deadline, the Court may deem the opposition waived, treat relief under the Motion to Expedite as conceded, and issue an order granting the requested relief. If you mail your response to the Bankruptcy Court, you must mail it early enough so that the Bankruptcy Court will receive it on or before the expiration of the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT any objection to the Motion to Compel must be made in writing, filed with the Bankruptcy Court at the following address: Clerk of the United States Bankruptcy Court, 701 East Broad Street, Suite 4000, Richmond, Virginia 23219, and served so as to be received by (i) Douglas M. Foley, Esq., McGuireWoods LLP, 9000 World Trade Center, 101 W. Main St., Norfolk, Virginia 23510; (ii) Dion W. Hayes, Esq., McGuireWoods LLP, One James Center, 901 E. Cary St., Richmond, Virginia 23219; (iii) Gregg Galardi, Esq., Skadden Arps, Slate Meagher & Flom LLP, One Rodney Square, Box 636, Wilmington, Delaware 19899; (iv) Robert B. Van Arsdale, Esq., Office of the United States Trustee, 701 East Broad Street, Suite 4304, Richmond, Virginia 23219; (v) Lynn L. Tavenner,

Esq., Tavenner & Beran PLC, 20 North Eighth Street, Second Floor, Richmond, Virginia 23219; (vi) Jeffrey N. Pomerantz, Esq., Brad R. Godshall, Esq., Pachulski Stang Ziehl & Jones, LLP, 10100 Santa Monica Blvd., 11th Floor, Los Angeles, California 90067-4100; (vii) John D. Fiero, Esq., Pachulski Stang Ziehl & Jones, LLP, 150 California Street, 15th Floor, San Francisco, California 94111-4500; and (viii) Robert J. Feinstein, Esq., Pachulski Stang Ziehl & Jones, LLP, 780 Third Ave., 36th Floor, New York, New York 10017 **no later than 11:59 p.m. prevailing Eastern Time on January 28, 2009** (the “*Motion to Compel Objection Deadline*”). Unless a written response is filed and served before the Motion to Compel Objection Deadline, the Court may deem the opposition waived, treat relief under the Motion to Compel as conceded, and issue an order granting the requested relief. If you mail your response to the Bankruptcy Court, you must mail it early enough so that the Bankruptcy Court will receive it on or before the expiration of the Motion to Compel Objection Deadline.

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If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief in the Motion to Expedite and the Motion to Compel and may enter an order granting the relief requested in the Motion to Expedite and the Motion to Compel.

Dated: January 26, 2009  
Richmond, Virginia

Respectfully Submitted,

/s/ J.R. Smith

J.R. Smith [VSB No. 41913]  
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- and -

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